

[Counsel listed on signature page.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re JDS UNIPHASE CORPORATION
SECURITIES LITIGATION

This Document Relates To: All Actions

) Master File No. C-02-1486 CW (EDL)

) CLASS ACTION

) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING THE TIME TO**
) **COMPLETE DISCOVERY OF**
) **CANADIAN NON-PARTY WITNESSES**

1 WHEREAS, pursuant to the Court's Order dated December 8, 2006, Lead Plaintiff,
2 Connecticut Retirement Plans and Trust Funds ("Lead Plaintiff"), was granted until April 2,
3 2007 to complete discovery with respect to Canadian non-party witnesses Thomas Pitre, Ken
4 Bradley and Gordon Buchan; and

5 WHEREAS, pursuant to the same December 8, 2006 Order, the Court granted Lead
6 Plaintiff the right to make a renewed request to extend the discovery deadline with respect to
7 these Canadian non-party witnesses; and

8 WHEREAS, on March 30, 2007 the Court granted the parties' joint stipulated request for
9 an extension of the discovery deadline with respect to the Canadian non-party witnesses until
10 May 15, 2007; and

11 WHEREAS, the parties met and conferred on April 30, 2007 and May 1, 2007 regarding
12 an additional extension of the discovery deadline with respect to these Canadian witnesses;

13 IT IS HEREBY STIPULATED by and between the parties, through their counsel of
14 record, that the date for Lead Plaintiff to complete discovery with respect to Thomas Pitre, Ken
15 Bradley and Gordon Buchan is extended to June 15, 2007.

16 IT IS HEREBY FURTHER STIPULATED that this stipulation does not waive Lead
17 Plaintiff's right to request an additional discovery extension, nor shall it waive Defendants' right
18 to oppose any future request to extend the discovery deadline.

19 IT IS HEREBY FURTHER STIPULATED THAT Lead Plaintiff will provide
20 Defendants at least 14 days' notice of its intent to depose any of the non-party Canadian
21 witnesses, unless a shorter time period is required by an order from the Canadian court (in which
22 case Lead Plaintiff will notify Defendants of the applicable order from the Canadian court no
23 later than 8:00 p.m. Pacific time the same day that Lead Plaintiff's Canadian counsel learns of the
24 order). However, Lead Plaintiff reserves its right to give shorter notice upon any subsequent
25 extension of the discovery deadline.

1 Respectfully submitted,

2
3 Dated: May ____, 2007

LABATON SUCHAROW & RUDOFF LLP

4 By: /s/ Michael W. Stocker

5 Lead Counsel for Lead Plaintiff
6 Connecticut Retirement Plans and Trust Funds

7 BERMAN DeVALERIO PEASE TABACCO
8 BURT & PUCILLO

9 Liaison Counsel for Lead Plaintiff
10 Connecticut Retirement Plans and Trust Funds

11
12 Dated: May ____, 2007

MORRISON & FOERSTER LLP

14 By: /s/ Philip T. Besirof

15 Attorneys for Defendants
16 JDS Uniphase Corporation, Charles J. Abbe, Jozef
17 Straus, and Anthony Muller

18 Dated: May ____, 2007

HELLER EHRMAN LLP

20 By: /s/ Howard S. Caro

21 Attorneys for Defendant
22 Kevin Kalkhoven

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24
25 PURSUANT TO STIPULATION, IT IS SO ORDERED

26 Dated: May 9, 2007



1 I, Michael W. Stocker, am the ECF User whose ID and password are being used to file
2 this Stipulation and [Proposed] Order Regarding: Extension of Discovery Period Solely for the
3 Purpose of Canadian Non-Party Discovery. In compliance with General Order 45, X.B., I
4 hereby attest that Philip Besirof, attorney for Defendants JDS Uniphase Corporation, Charles J.
5 Abbe, Jozef Straus, and Anthony R. Muller, and Howard Caro, attorney for Kevin Kalkhoven,
6 have concurred in this filing.

7
8 Dated: May 9, 2007

LABATON SUCHAROW & RUDOFF LLP

9
10 By: /s/ Michael W. Stocker
11 Michael W. Stocker
12 Counsel for Lead Plaintiff
13 Connecticut Retirement Plans
14 and Trust Funds
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